

Final Environmental Impact Report
Salinas Travel Center

State Clearinghouse #2016101058

June 12, 2018



FINAL EIR

SALINAS TRAVEL CENTER

State Clearinghouse #2016101058

PREPARED FOR

City of Salinas Community Development Department

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1.0 Introduction

The City of Salinas (City), acting as the lead agency, determined that the proposed Salinas Travel Center (hereinafter “proposed project”) could result in significant adverse environmental effects, as defined by the California Environmental Quality Act (CEQA) Guidelines section 15064. Therefore, the City had a draft environmental impact report (draft EIR) prepared to evaluate the significant adverse environmental impacts of the proposed project. The draft EIR was circulated for public review to the State Clearinghouse, to responsible and trustee agencies, and to local and regional agencies, organizations, and individuals from February 20, 2018 through April 5, 2018. CEQA Guidelines section 15200 indicates that the purposes of the public review process include sharing expertise, disclosing agency analysis, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals.

This final environmental impact report (final EIR) has been prepared to address comments received during the public review period and, together with the draft EIR, constitutes the complete Salinas Travel Center EIR. This final EIR is organized into the following sections:

- Section 1 contains an introduction to this final EIR.
- Section 2 contains written comments on the draft EIR, as well as the responses to those comments.
- Section 3 contains revisions to the draft EIR resulting from responses to comments on the draft EIR.
- Section 4 contains the revised draft EIR summary. The revised summary reflects revisions identified in Section 3.

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2.0

Comments on the Draft EIR and Responses to Comments

2.1 CEQA REQUIREMENTS

CEQA Guidelines section 15132(c) requires that the final EIR contain a list of persons, organizations, and public agencies that have commented on the draft EIR. A list of the correspondence received during the public review period is presented below. CEQA Guidelines sections 15132(b) and 15132(d) require that the final EIR contain the comments that raise significant environmental points in the review and consultation process, and that written responses to those comments be provided. A copy of each comment letter or other form of correspondence received during the public review period is provided. The number of each letter is included in the upper right hand corner of the first page of each letter. Numbers inserted along the margin of each comment letter identify individual comments for which a response is provided. Responses corresponding to the numbered comments are presented immediately following each letter.

Where required, revisions have been made to the text of the draft EIR based on the responses to comments. Responses that trigger changes to the draft EIR are so noted as part of the response. Revisions to the draft EIR are included in Section 3.0, Changes to the Draft EIR.

2.2 COMMENTS ON THE DRAFT EIR AND RESPONSES TO COMMENTS

The following letters were received during the 45-day public review period on the draft EIR:

1. LandWatch Monterey County (March 20, 2018);
2. Monterey County Local Agency Formation Commission (LAFCO) (March 26, 2018);
3. Monterey County Resource Management Agency (RMA) (April 2, 2018);
4. Brian Finegan & Michael J. Harrington, Attorneys at Law (April 5, 2018);
5. Monterey Bay Air Resources District (April 5, 2018); and
6. California Department of Transportation (Caltrans) (April, 2018).

2.0 Comments on the Draft EIR and Responses to Comments

Table 2-1, Commenters and Environmental Issues, identifies agencies, organizations, and individuals that provided comments on the draft EIR. The topics of significant environmental comments raised in each comment letter are identified.

Table 2-1 Commenters and Environmental Issues

	LandWatch Monterey County	Monterey County LAFCO	Monterey County RMA	Finegan & Harrington, Attorneys	Monterey Bay Air Resources District	Caltrans
Project Description	X		X			
Aesthetics			X			
Agricultural Resources		X	X	X		
Air Quality					X	
Biological Resources						
Climate Change	X					
Cultural Resources			X			
Geology and Soils						
Hazards and Hazardous Materials						
Hydrology and Water Quality						
Noise						
Public Services						
Transportation			X			X
Wastewater						
Water Supply	X					
Cumulative Impacts						
Growth Inducing Impacts						
Energy Conservation						
Economic Effects/Urban Decay						
Alternatives						



March 20, 2018

Jill Miller, Senior Planner
 City of Salinas Community Development Department
 65 West Alisal Street, 2nd Floor
 Salinas, CA 93901

Subject: [Salinas Travel Center Draft Environmental Impact Report](#)

Dear Ms. Miller:

LandWatch Monterey County has reviewed the Draft Environmental Impact Report for Salinas' Travel Center that includes a general plan amendment, a specific plan, pre-zoning, annexation, parcel map, and site plan reviews for two proposed development projects. The project site is currently designated "general industrial" in the City of Salinas General Plan. The proposed project includes a general plan amendment to redesignate 2.19-acres for a hotel and 13.86-acres for a gas station, convenience store, fast food restaurant and mechanics building. Specific development projects for parcels 3 and 4 totaling 17.93-acres are not proposed at this time. The project site is located within a Future Growth Area. County zoning for the site is Farmlands (F), 40-acre minimum combined with Urban Reserve (UR).

The annexation area includes approximately 30 acres within a State of California Department of Transportation (Caltrans) right-of-way for U.S. Highway 101 Ramp 326A and within rights-of-way for the adjacent local public streets. The approximately 34-acre balance of the annexation area would be available for future development.

LandWatch comments as follows:

- **General Plan Amendment and Zone Change.** The DEIR states, "The applicant is requesting that the existing land use designation for a 2.19-acre portion of the project site be amended to Retail..." (p. 4-2) and "With the exception of a 2.19-acre parcel, the remainder of the project site would be zoned Industrial General (IG) consistent with the corresponding land use designation." (p. 4-7) Table 2-1 and Table 4-7 show 13.86-acres for the gas station, etc. Please explain why the 13.86-acres do not require a general plan amendment and zone change.
- **Greenhouse Gas Emissions.** The proposed project would generate approximately 8.52 MT CO₂e per service population. This exceeds the threshold of significance identified by the lead agency of 3.51 MT CO₂e per service population rate of emissions generation for 2025. This emission reduction is needed for proposed project emissions to remain within the statewide emissions trajectory mandated by SB 32, i.e., meet the 2030 statewide emissions reduction goal of 40 percent below 1990 levels. The proposed

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mitigation measure requires preparation of greenhouse gas reduction plans. The plans must include specific measures that reduce greenhouse gas emissions below the threshold of significance and are subject to review and approval by the Community Development Director prior to approval of building permits.

The greenhouse gas reduction plans would require more than a 50% reduction in greenhouse gas emissions. Because of the very significant required reduction, mitigation measures may be infeasible. The mitigation plans should be specified in the FEIR because the required greenhouse gas mitigation is not known to be feasible. (Communities for a Better Environment v. City of Richmond (“CBE v. Richmond”) (2010) 184 Cal.App.4th 70). If mitigation is infeasible, the EIR must acknowledge that the impact would be unavoidably significant and a DEIR recirculated since a new unavoidable significant impact was not identified in the current DEIR. (CEQA Guidelines 15088.5a).

- **Water Supply.** The baseline analysis assumes water demand from parcels 3 and 4 even though these parcels are not designated for development at this time. The DEIR states, “The proposed project would replace demand for groundwater from agricultural use with demand for groundwater from urban uses. The net change in water demand derived from this conversion is the difference between the existing agricultural baseline demand from existing agricultural activities on Parcels 3 and 4 and water demand from future development within the entire project site, including Parcels 1 and 2.” (p. 18-19). The DEIR analysis which calculates water demand for all 4 parcels takes credit for reduced water demand of 76.30 acre feet per year from agricultural use, resulting in a net benefit of 29.71 acre feet per year.

The water supply analysis should be revised to include an analysis of baseline conditions and net water demand for Parcels 1 and 2. Since the land has been fallow since 2012 (Table 6-1), no offsets for existing water use appear to be available for development on those parcels. Table 18.2 identifies water demand for Parcels 1 and 2 at 27.6 acre-feet per year. Assuming some water savings for outdoor water recharge and indoor water recharge/recycling, Parcels 1 and 2 would increase water demand by approximately 20 acre feet per year (Assumes the same percentages for net water demand as for the entire project).

An enforceable mitigation measure that requires parcels 3 and 4 to stop using water as soon as the project is approved is required to avoid a finding of significant and unavoidable impacts on the Salinas Valley Groundwater Basin. Seawater intrusion impacts will be aggravated in the near term by any net increase in pumping, and the impact is irreversible.

Thank you for the opportunity to review the DEIR.

Regards,



Michael DeLapa
Executive Director

Responses to Letter #1, LandWatch Monterey County

Response #1: The travel center proposed on the 13.86-acre parcel 2 is permitted within the City of Salinas General Industrial land use designation that applies to that parcel with a Site Plan Review approval. No change to the existing General Industrial land use designation is required to enable the proposed travel center. The administrative Site Plan Review process will be completed after the City Council and Monterey County Local Agency Formation Commission (LAFCO) take action on approvals that are within their respective authority. The 13.86-acre parcel does not require a zone change. The proposed I-G rezoning for parcel 2 implements the existing General Industrial land use designation. Effectively, if the proposed project is approved by the City of Salinas and LAFCO, the zoning on the site would change from County of Monterey Farmlands (F) to City of Salinas I-G.

Response #2: There is no correlation between the 50 percent reduction in greenhouse gas emissions (GHG) volume needed and the potential infeasibility of the required GHG reduction measures included in mitigation measure GHG-1 of the draft EIR. The GHG reduction measures were screened for their applicability and feasibility for the proposed end use types - hotel and travel center on parcels 1 and 2, respectively, and for the types of future development that may occur on parcels 3 and 4. The required components of the mitigation plans are in fact specified in the draft EIR as the 10 GHG reduction measures included in mitigation measure GHG-1. The mitigation measure also requires that individual project applicants obtain additional GHG emissions reductions through off-site GHG reduction programs and/or through purchase of carbon off-sets should the required on-site measures not achieve the required GHG volume reduction to reduce the impact to less than significant. The purpose of the individual GHG reduction plans is to, on a project-by-project basis, identify and quantify the reductions that would be achieved on-site and identify the balance of the reductions that must be purchased (if any) to assure that the GHG emissions reduction volume needed to reduce the impact to less than significant will be achieved.

Response #3: Consistent with CEQA Guidelines section 15378(a), the draft EIR evaluates “the whole of the action which has potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment...” The whole of the action for which the draft EIR assesses environmental impacts includes development of the entire project site that could be enabled by the City’s approval of a General Plan Amendment, Specific Plan, Rezoning, and Annexation. The whole of the action includes development of all four parcels and the related groundwater effects of converting fallow land (parcels 1 and 2) and land in active agricultural use (parcels 3 and 4) to urban uses. The whole of the action will positively impact groundwater conditions by increasing the volume of groundwater that remains in storage.

The comment suggests that parcels 3 and 4 are not “designated for development at this time”. The proposed project would streamline the project specific development entitlement process for all four parcels by creating the land use (General Plan Amendment), development guidance (Specific Plan), zoning (Rezoning), and authority for urban development (Annexation) needed to enable specific development projects to proceed. Through these approvals, all four parcels will have equal potential to develop.

The City has received applications for specific projects for parcels 1 and 2 (hotel and travel center, respectively). Because more detailed information is available to the City for proposed development on those parcels, that detail is also included in the draft EIR. In several locations in the draft EIR, an assumption is made that parcels 1 and 2 would develop before parcels 3 and 4. This assumption is based primarily on the fact that project specific applications (Site Plan Review) have been submitted for the proposed hotel and travel center projects on parcels 1 and 2. Nothing in the draft EIR project description or analysis of impacts presumes that development on parcels 1 and 2 must precede development on parcels 3 and 4. For several reasons, it is quite possible that parcels 3 and 4 could develop concurrently with or soon after parcels 1 and 2 develop, such that no meaningful increase in groundwater demand volume or duration would occur as suggested by the commenter.

The Site Plan Review process for development of parcels 1 and 2 cannot be completed until after the City Council’s action to approve the four noted actions and after LAFCO approves the annexation. LAFCO’s consideration and approval of the annexation is projected to occur in the fall or winter of 2018. Therefore, the Site Plan Review approvals for the hotel and travel center would not be completed or become effective until after that time. This is presuming that there will be no substantive issues to be resolved by the Applicant for these projects based on City staff review of the Site Plan Review applications. Such issues, if they are identified, could further delay the Site Plan Review approval process for development of parcels 1 and 2. Further, it is uncertain when the hotel and travel center projects would actually be constructed and become operational (start to demand groundwater). Myriad variables could affect whether one or both projects are actually constructed and/or when construction is completed.

Since the draft EIR was circulated for review by the City in February 2018, the City has been contacted by and met with several interests who have inquired about development opportunities on parcels 3 and 4; it was not possible to report such interest in the draft EIR. Release of a draft EIR is a milestone in the land development entitlement process which signals that the entitlement process is moving forward with a level of certainty. In the case of the proposed project, the entitlement process would result in streamlining individual project development opportunities for individual future projects on all four parcels. While as of April 2018 the City had not received applications for individual development projects for parcels 3 and 4, there is nothing to preclude individual project applications from being submitted at any time in anticipation of the City Council approving the four aforementioned actions and LAFCO approving the annexation.

Therefore, it is reasonably foreseeable that development on parcels 3 and/or 4 could occur concurrently, soon after, or even before development occurs on parcels 1 and/or 2.

LAFCO *of Monterey County*

LOCAL AGENCY FORMATION COMMISSION OF MONTEREY COUNTY

2018

March 26, 2018

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RE: Salinas Travel Center Draft Environmental Impact Report (EIR)

Dear Ms. Miller:

Thank you for continuing to coordinate with LAFCO on review of the Salinas Travel Center project. LAFCO provided comments on the Notice of Preparation of this EIR in November 2016. The project proposes a variety of commercial and industrial land uses on a 64-acre, currently unincorporated site adjacent to current city limits and within the city's LAFCO-designated Sphere of Influence.

Background

Under the California Environmental Quality Act, LAFCO is a Responsible Agency for this proposal, and will have regulatory authority for future applications for annexation of the site, as the project description in the Notice anticipates. It is in this role that LAFCO is commenting on the project's EIR.

Development of the project would include urban-type development on approximately 33 acres of lands designated as Prime Farmland and other farmland classifications on the State's Important Farmlands Map. State LAFCO law provides that "Among the purposes of a [LAFCO] are discouraging urban sprawl [and] preserving open-space and prime agricultural lands."

Accordingly, LAFCO of Monterey County has adopted local policies that address impacts to, and preservation of, agricultural lands. The full text of LAFCO's policies is available on our web site: www.monterey.lafco.ca.gov. Part E of LAFCO's policies specifically addresses agricultural lands and states, in part: "A Proposal must discuss how it balances the state interest in the preservation of open space and prime agricultural lands against the need for orderly development."

Project's Conversion of Ag Lands: Specific Mitigation Proposal Requested

The Draft EIR states the project's impacts on agricultural lands (defined as designated Prime Farmland, Farmland of Statewide Importance, and Unique Farmland as designated by the State Department of Conservation's Important Farmland Map) will be mitigated by dedication of permanent conservation easements at a 1:1 acreage ratio to the satisfaction of the City of Salinas Community Development Director prior to the issuance of grading permits by the City.

LAFCO requests that this mitigation measure be revised to include the specific locations, acreages, and site characteristics of the anticipated conservation easements in the final EIR. Inclusion of this information in the EIR will facilitate the timeliness of LAFCO's ability to evaluate the proposed mitigation's conformance to LAFCO's legislative mandate and adopted policies. If unable to include this level of detail in the EIR, the City should nevertheless anticipate that, in keeping with our standard practice, LAFCO expects to receive these important details of the proposed conservation easements at the time of filing the annexation application. LAFCO will, at that time, evaluate conformance of the proposed conservation easements to our legislative mandate and policies.

When planning for specific easement locations and acreages, please also be aware that the process for dedicating conservation easements typically involves two separate co-grantees: a land trust and the County of Monterey. As a possible alternative to specifying conservation easements prior to the annexation process, the City and project proponents may wish to explore proposing an in-lieu fee payment to a qualified land trust. The land trust would then use such funds to offset the project's ag land conversion impacts as appropriate land conservation opportunities arise.

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Cont.

Our 2016 comment letter offered that "Pursuant to item 4 of the adopted 2006 City-County Greater Salinas Area Memorandum of Understanding (MOU), the City should consider asking for the County's input as to what would be an appropriate solution for addressing this project's impacts to agricultural lands." Such consultation does not appear to have occurred.¹ However, LAFCO continues to encourage the City to seek the County's input in this matter.

2

Agricultural Buffers

As discussed in the Draft EIR, development of Parcels 3 and 4, on the overall site's southern edge, will create an interface with existing agricultural operations to the south. The potential sensitivity of this interface is lessened by factors such as the industrial nature of the proposal, and by existing physical separation (e.g., a 10-foot-high bluff, drainage ditch, and farm roads). Potential concerns are further lessened, in this case, by the temporary nature of this interface; agricultural lands to the south are within the city's Sphere of Influence and presumably likely to be annexed and developed in the reasonably foreseeable future. Considering these factors, as well as the City's proposed specific plan policies for agricultural buffering, LAFCO anticipates that the approach discussed in the Draft EIR will be adequate to satisfy LAFCO's policies regarding buffers. As noted in our November 2016 comments, we support consultation about the buffer area with County Agricultural Commissioner staff. Consultation with Ag Commissioner staff at the time of City land use permitting could be specified in the impact avoidance language, beginning on Page 6-13 of the Draft EIR, to further reduce potential impacts between adjacent agricultural and non-agricultural land uses.

3

Timing of Proposed Development

In 2016, LAFCO commented that the Draft EIR's project description "should include a discussion as to the likely commencement of construction for all parcels within the project, potentially phased. Per LAFCO policies and practice, annexation into a city is appropriate for lands that are anticipated to begin development within approximately five years." Based on recent discussions between project proponents and LAFCO staff, development appears to likely commence within that timeframe. Please include a rough estimate for commencement of development as part of the Final EIR and when submitting an annexation application to LAFCO.

4

Conclusion

LAFCO looks forward to working with the City of Salinas and the property owners in the future. Please continue to keep us informed throughout your process. City staff and consultants are welcome to contact LAFCO's Executive Officer Kate McKenna for further discussions.

Sincerely,

Simón Salinas, Chair

¹ Page 6-9 of the Draft EIR states that "The City has determined that the [MOU] is applicable only to the lands addressed in that document and consequently, annexation of land that is not specifically identified in the memorandum is, including the project site, is not subject to the agreements included therein." The basis for this conclusion is unclear. The MOU's stated purpose is to "assure orderly and appropriate land use development in the area designated in the General Plan of Monterey County as the Greater Salinas Area Plan and in the City of Salinas" (Paragraph 2). The proposal site is within the Greater Salinas Area as designated in the County's General Plan.

Responses to Letter #2, Monterey County Local Agency Formation Commission (LAFCO)

Response #1: Mitigation measure AG-1 in the draft EIR requires that the agricultural conservation easement to be executed before the City issues a grading permit to any project proposed within the project site. The City expects the applicant to identify the location, acreage, and characteristics of the land identified for the conservation easement prior to the City Council's consideration of the proposed project. The Applicant is expected to provide such information for inclusion in the LAFCO reorganization application and the City recognizes LAFCO's need for the information prior to LAFCO's consideration of the reorganization application.

Notably, however, the City does not believe that such information is necessary to make the draft EIR adequate under CEQA. Case law dealing with off-site mitigation for the filling of on-site wetlands is clear that an environmental document, to be adequate, need not identify the specific off-site locations at which such mitigation will occur, as long as the mitigation measure at issue includes a performance standard that must be satisfied at whatever off-site location is ultimately chosen. (*California Native Plant Society v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603, 621-622.) There is no reason why such logic would not apply to the use of conservation easements to protect off-site agricultural lands. Mitigation Measure AG-1 sets a quantitative ratio of one to one, which has been found to be acceptable by the courts. (*Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 322-324.)

Response #2: As noted in the draft EIR, the City has determined that development of the project site is not subject to the Greater Salinas Area Memorandum of Understanding (GSA MOU). The GSA MOU addresses lands to the north and east of the city as identified in Exhibit A, Salinas 2005 Preliminary Sphere of Influence (SOI)/Annexation Map, contained in the GSA MOU. The project site is not identified in Exhibit A as one of the areas proposed for future growth which the City deems are subject to agreements included in the GSA MOU. Regardless, the draft EIR addresses the impacts of the proposed project on agricultural land, both from conversion of agricultural land to non-agricultural use, and from potential indirect conversion of adjacent agricultural land. Mitigation measure AG-1 in the draft EIR includes mitigation for the direct agricultural land conversion impact that requires placement of a permanent agricultural easement over agricultural land of equal or better quality at a ratio of 1:1. As mitigation for potential indirect impacts from agricultural land conversion, the draft EIR references a policy in the Specific Plan that addresses the need for temporary agricultural buffers. Specific Plan policy 2-3.1 requires developers of individual projects within parcels 3 and 4 to include temporary agricultural buffers designed to minimize potential conflicts between urban development within those parcels and continuing agricultural operations on adjacent lands located to the south.

The agricultural conservation easement and agricultural buffer mitigations are common, accepted solutions for addressing impacts of urban development on agricultural lands. This mitigation approach is consistent with the mitigation approach included in the Salinas Economic Development Element Final Program EIR, which was certified by the City Council in December 2017. The County was consulted as part of that EIR process, including regarding the City's agricultural land conversion and agricultural buffer mitigation approach.

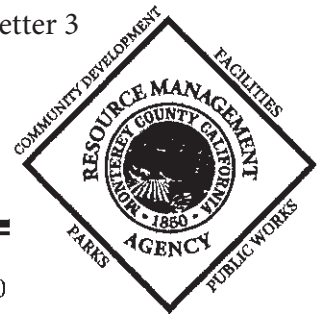
It should be noted that the City received detailed comments from the Monterey County Resource Management Agency, which did provide input on the Draft EIR generally, and in particular provided input regarding the effects of the proposed project on agricultural lands and the best means of mitigating such effects.

Response #3: Draft EIR Section 1.4, Development Review Process, identifies how the City will ensure consistency of future development with policies contained in the Specific Plan. This will be done through the development review process to be conducted for each future individual development project. Consistency of future development within parcels 3 and 4 with Specific Plan policy 2-3.1, which identifies the requirement for temporary agricultural buffers, will be assessed at that time. For illustrative purposes, the draft EIR (pp. 6-14 to 6-15) includes reference to criteria contained in the Monterey County General Plan for agricultural buffers. The City does not have specific criteria for such buffers. Therefore, the City may consider the County criteria in assessing the adequacy of proposed temporary buffers and may consult the County Agricultural Commission staff in this regard.

Response #4: Consistency of the project with LAFCO policies and procedures is summarized in Appendix H of the draft EIR, LAFCO Policy Consistency Analysis, based on information that was available at the time the draft EIR was circulated for public review. Section VIII.1 of the LAFCO policies addresses phasing. As noted in Appendix H, the anticipated project site build out period is five to seven years. This same information will be included in the Reorganization application to LAFCO. It is worth noting that since the draft EIR was released for public review and comment, several parties have approached the City to inquire about development opportunities within parcels 3 and 4. To date, the City has not received applications for individual development projects for those parcels. Nevertheless, it is quite possible that applications for development of parcels 3 and 4 could be submitted in the near term such that the build out timeframe could be less than five to seven years. Please also refer to the response to comment #3 from LandWatch Monterey County.

MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Director



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April 2, 2018

City of Salinas Community Development Department
Attn: Jill Miller, Senior Planner
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Salinas, CA 93901

RE: COMMENTS ON THE SALINAS TRAVEL CENTER DEIR

Dear Ms. Miller,

Thank you for providing the County of Monterey with an opportunity to review and respond to the DEIR for the Salinas Travel Center. RMA-Planning has consolidated all comments received from Monterey County Agricultural Commissioner, RMA-Public Works Development Services, and agencies and the Monterey County Water Resources Agency in order to provide the City with one comment letter.

Greater Salinas Area Memorandum of Understanding (GSA MOU)

The DEIR states that the GSA MOU is “applicable only to the lands addressed in that document and consequently, annexation of land that is not specifically identified in the memorandum, including the project site, is not subject to the agreements included therein.” However, it is staff’s understanding that the subject property is applicable pursuant to Section 1 of the GSA MOU where it states: *“City and County agree that the future growth direction of the City shall be to the north and east of the current City limits, except as otherwise provided for in this MOU.”* Therefore, staff suggests the DEIR include a discussion clarifying that the project site is covered under the GSA MOU and is consistent with the City and County’s agreement for future growth (see comments under Agricultural Resources). This would support evidence for consistency with Greater Salinas Area Plan Policy GS-1.14 requiring *annexations or sphere of influence amendments covered by the Greater Salinas Area Memorandum of Understanding (GSA MOU) to be consistent with and governed by the terms of the GSA MOU and with the City’s General Plan.*

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Project Description

The project description should be clarified in the summary (page 2-2) and project characteristics (page 4-8) to ensure it is understood that the Parcel Map includes the subdivision of a 261-acre parcel. The acreage of the remainder parcel should also be clarified.

2

The Greater Salinas Area Plan designates the subject property as “Farmlands, 40 Acre Minimum, Urban Reserve” (Figure LU7 of the 2010 General Plan) and zoning for the property is Farmland, 40 Acre Minimum Building Site (Sectional District Map Section 21.13).

3

Aesthetics

Statements within the *Visual Character of Proposed Development within Parcels 1 and 2* and *Summary of Visual Change* are inconsistent in terms of whether or not the most prominent visual change would occur when viewed from the northbound lanes or the southbound lanes of U.S. Highway 101. This conflict should be rectified.

4

Agricultural Resources

The project proposes a variety of commercial and industrial land uses on a 64-acre, currently unincorporated site adjacent to current city limits and within the city's LAFCO-designated Sphere of Influence (SOI). Development of the project would include urban-type development on approximately 33 acres of lands designated as Prime Farmland and other farmland classifications on the State's Important Farmlands Map. It is imperative that impacts to adjacent agricultural lands are addressed via adequate buffers and mitigation ratios, despite the fact that this project site is already within the City's SOI. While the City coordinates with LAFCO on the annexation of this project from the County, it must be demonstrated that the project minimizes impacts to the maximum extent feasible.

The analysis presented in the DEIR states that the conversion of this prime farmland would be mitigated to a less than significant level at a 1:1 rate. However, this ratio is insufficient to address this impact, and a 2:1 mitigation should be required, particularly given the fact that this project would convert prime farmland. More specifics are needed to address the location, acreage, soils, and conservation easement requirements for mitigation. If specific locations for locating easement(s) to mitigate this impact are not available at this time, an alternative option is to provide an in-lieu payment to the local land trust. The Monterey County Agricultural Commissioner's office requests a formal consult with City staff to discuss specific mitigation prior to the final EIR's release, in accordance with the 2006 MOU.

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Section 6.5 identifies that the development's potential to facilitate conversion of farmland to a non-agricultural use would result in a less than significant impact through implementation of Policy 2-3.1 of the Salinas Travel Center Specific Plan, which requires temporary agriculture buffers/conservation easements when urban development is proposed to be directly adjacent to productive agriculture. Although the remaining portion of APN 177-131-011-000 that is outside of the Specific Plan is within the SOI, the majority of the area is identified as prime farmland. Therefore, to prevent premature conversion of existing agricultural use, Policy 2.-31 should be modified to include specific and quantifiable requirements that shall be met before the temporary buffer/easement can be lifted or the impact should be less than significant with mitigation that includes performance standards for when it would be appropriate to remove the temporary buffer/easement. Coordination with these landowners should occur to request input on any aspects of the project that could be incorporated to address their concerns about conversion and human presence.

7

Cultural Resources

The Regulatory Setting includes a discussion on AB 52 and SB 18 and the protection of tribal cultural resources. In accordance with the final text for tribal cultural resources update to Appendix G, the DEIR should include a separate section or subsection focused on impacts to tribal cultural resources.

8

Mitigation Measure CR-2 references Public Resources Code section 5097.98 and states that the most likely descendent (MLD) has 24-hours to make a recommendation if human remains are

9

found. The response time is incorrect as the code referenced specifies that the MLD has 48-hours to respond. The mitigation should be revised accordingly.

Circulation

Traffic generated by the project connects to roads within the City of Salinas to the north and Caltrans Hwy 101 to the south. There will be no direct impact to the County Road System. However, the DEIR should clearly identify if the project will have an impact to the regional road system and how that impact would be mitigated (i.e. payment of TAMC fees).

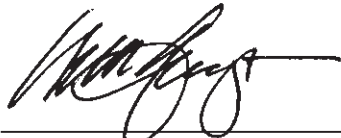
10

Water Resources Agency

The project's EIR consultants and civil engineer worked ahead of time with the MCWRA to address potential Zone 9 Reclamation ditch, and flood and storm water control issues. The development as shown in the DEIR is setback from the MCWRA Reclamation Ditch as requested (as shown in fig 3-2) and the addition flood and storm waters resulting from the project, will be appropriately mitigated to pre-development rates (per info in the DEIR's Hydrology section).

Again, thank you again for providing the County an opportunity to review the DEIR.

Sincerely,



Anna V. Quenga, Senior Planner
RMA-Planning
(831) 755-5175
quengaav@co.monterey.ca.us

Responses to Letter #3, Monterey County Resource Management Agency (RMA)

Response #1: Please see the response to comment #2 from LAFCO.

Response #2: The four parcels that would be created within the project site total 33.98 acres. The size of the remainder parcel is the balance of the 261 acres, or approximately 227.02 acres.

Response #3: Comment noted. The draft EIR (p. 4-2) includes references to existing County land use and zoning. The comment suggests that the draft EIR references should be clarified. Please refer to Section 3.0, Changes to the Draft EIR, where the text on page 4-2 has been modified for this purpose.

Response #4: The draft EIR (p. 5-22) references that the proposed travel center monument sign will be more visible from the southbound direction on U.S. Highway 101 because it would be viewed against a background of agricultural fields and distant mountains. From the northbound direction, the sign would be viewed against a background consisting of urban development, including the proposed hotel, which will be of similar height. Therefore, from the northbound direction, the sign will not be as dominant a visual feature. The draft EIR isolates only the monument sign as being more prominently visible from the southbound direction. The draft EIR does not include a relative comparison of the overall visual change based on southbound versus northbound views from the highway.

Response #5: Converting Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use is considered an irreversible effect and a significant and unavoidable impact. Mitigation in the form of agricultural easements cannot reduce the impact to less than significant, regardless of the mitigation ratio required. The City's precedent for Important Farmland conversion impacts is to require mitigation in the form of a permanent agricultural easement at a 1:1 ratio. This precedent was most recently reaffirmed in the Salinas Economic Development Element Final Program EIR, which was certified by the City Council in December 2017. This is a commonly accepted mitigation ratio across California. There is no policy or regulatory mandate for the City to require a higher ratio. Notably, this same ratio – 1:1 – was upheld in a leading court case in which project opponents were advocating higher ratios of the kind the County is advocating here. (*Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 322-324.)

The significant unavoidable impact relates to conversion of Important Farmland, not solely Prime Farmland. In the CEQA context, mitigation requirements need not discern between mitigation for Prime Farmland relative to mitigation for other classes of Important Farmland.

Response #6: Please refer to the response to comment #1 from LAFCO regarding agricultural conservation easement details. Please refer to the response to comment #2 from LAFCO regarding applicability of the GSA MOU regarding the recommended consultation with the Monterey County Agricultural Commissioner.

Response #7: In response to the comment, City staff and the Applicant concur that changes to Specific Plan policy 2-3.1 to include performance standards are warranted. Policy 2-3.1 will be modified for this purpose and the modifications will be reflected in the version of the specific plan to be considered by the City Council as part of its project consideration process.

Response #8: Appendix G of the CEQA Guidelines states that Appendix G is a (emphasis added) “*sample* form and *may be* tailored to satisfy individual agencies’ needs and project circumstances. It *may* be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met. Substantial evidence of potential impacts that are not listed on this form must also be considered. The *sample* questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.” There is nothing in CEQA or the CEQA Guidelines including Appendix G that mandate issues be addressed together or separately in an initial study or an EIR.

As noted in the Regulatory Setting section of the draft EIR, tribal cultural resources are discussed separately from other types of cultural resources to clarify the distinction between tribal cultural resources and other types of resources. Also noted in that discussion, no tribal cultural resources were identified as present based on consultations conducted as mandated per Assembly Bill 52 or Senate Bill 18. Therefore, no specific impacts on known tribal resources were identified in the draft EIR. Had clear potential for tribal resources to be present within the project site been identified, the evidence supporting this conclusion would have been presented separately in the Impact Summary and Mitigation Measures section.

Nothing in the text of the various statutes that make up AB 52 requires that EIRs address tribal cultural resources in a chapter entirely separate from the discussion of other cultural resources. The fact that the Legislature added new tribal cultural resource questions to Appendix G in a particular location cannot be reasonably understood to require, as a matter of law, that EIRs devote a distinct section to such resources. Lead agencies have the discretion to do so, but no obligation to do so.

Response #9: This correction has been made to mitigation measure CR-2 as identified by the commenter. Please refer to Section 3.0, Changes to the Draft EIR.

Response #10: The draft EIR includes extensive analysis of impacts on the regional road system, namely Caltrans-controlled facilities. The impact is mitigated through payment of traffic impact fees that are designed to mitigate cumulative impacts on the impacted facilities. Please refer to Section 16 of the draft EIR for the analysis of transportation-related impacts and specifically, to pages 16-44 to 16-45 for a discussion of impacts to the regional system and applicable mitigation measures.

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&
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April 5, 2018

HAND DELIVERED and SENT VIA EMAIL

Jill Miller
Associate Planner
City of Salinas Community Development Department
65 West Alisal Street
Salinas, California 93901

Re: Salinas Travel Center Draft Program EIR

Dear Ms. Miller:

On behalf of the applicant, Love's Country Stores of California, I submit the following comments on the Draft Program EIR ("DEIR") for the Salinas Travel Center project.

Agricultural Resources

One of the Applicant's principal areas of concern relates to the mitigation proposed for the conversion of agricultural land. Although the conversion of agricultural land is understandably a matter of significant concern to the City, the region and the state, mitigation measure AG-1 fails to distinguish between the impacts associated with the development of the vacant fallow land comprising the hotel and travel center parcels (parcels 1 and 2), for which farming is not feasible, and the conversion of parcels 3 and 4, which are actively farmed.

The DEIR relies on the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), mapped on the *Monterey County Important Farmlands Map* (California Department of Conservation 2014), as the basis for designating parcels 1 and 2 of the Project Site as either Prime Farmland or Farmland of Statewide Importance. As shown on Figure 6-1 of the DEIR, "Farmland Mapping Classifications", parcel 1 is classified as Farmland of Statewide Importance and parcel 2 is classified as Prime Farmland. As a direct result of these classifications, Mitigation Measure AG-1 requires the developers of the hotel and the travel center parcels to provide mitigation for the conversion

of farmland, in the form of dedication of a permanent agricultural conservation easement at a ratio of 1:1.

While the FMMP is specifically referenced on the Environmental Checklist Form of CEQA Guidelines Appendix G for determining potentially significant impacts to Agricultural Resources, it is by no means the only method of fashioning a threshold of significance. As stated in the DEIR, "lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of agricultural resource impacts, or indeed on any subject addressed in the checklist. (*Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068). Rather, with few exceptions, "CEQA grants agencies discretion to develop their own thresholds of significance.'" The City should do so here. In this case, site characteristics and the prior acquisition of the land immediately surrounding Parcels 1 and 2 by the California Department of Transportation ("Cal Trans") for construction of the U.S. Highway 101 Ramp 326A improvements (the "Highway Interchange") render farming activities on the parcels 1 and 2 infeasible and the use of the FMMP's farmland classifications inappropriate.

Cal Trans acquired fee title to the property necessary for the Highway Interchange improvements from the current property owners in 2009, thereby creating parcels 1 and 2 as remainders from an original single agricultural parcel.¹ The land comprising parcels 1 and 2 has remained fallow ever since Cal Trans' acquisition.² As Cal Trans noted in its official 2008 Appraisal Review Report regarding the Project Site, "the current irrigation pipeline [serving the land within what is now Parcel 2] will need to be cut and capped". As a result, there is no longer a reasonable means of irrigating these parcels absent an exorbitant financial investment. This led Cal Trans to conclude that: (a) "the highest and best use of the center remainder [parcel 2] is for development to comparable industrial uses that meet Industrial General standards with potential for conversion to commercial use"; and (b) the "highest and best use of the small northerly remainder [parcel 1] is for development to a commercial use". In other words, given the small size of the newly created remainder parcels, the location of the Highway Interchange improvements, and the lack of irrigation infrastructure necessary to support agricultural activities, farming was no longer feasible on parcels 1 and 2. We agree.

Feasibility is defined by the CEQA guidelines as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."³ Taking these factors into account, one must conclude that farming is no longer

¹ In its' 2008 official Appraisal Review Report, Cal Trans refers to Parcels 1 and 2 as the "Smaller Northerly Remainder" and "Center Remainder", respectively.

² The DEIR incorrectly notes on 6-3 that the land within parcels 1 and 2 has "been fallow since Caltrans completed its U.S. Highway 101 Ramp 326A improvements in 2012."

³ CEQA Guidelines Section 15364

feasible on parcels 1 and 2 (this is evidenced by the fact that no farming activities have taken place thereon since Cal Trans acquired the land for the Highway Interchange improvements in 2009). The capital costs required to farm such a small area far exceed any agricultural benefit they could otherwise provide and would likely require the drilling of a high-capacity agricultural well for the sole purpose of irrigating parcel 2 (13 acres), as well as the installation of additional irrigation lines under De La Torre Street to serve the adjacent parcel 1 (2 acres). Simply put, it isn't economically feasible. As such, parcels 1 and 2 should not be construed as farmland being converted – they were already converted by Cal Trans in 2009.

In addition, prior to initiating construction of the Highway Interchange project, Cal Trans performed an "Initial Study with Proposed Mitigated Negative Declaration/ Environmental Assessment" ("the IS/MND"). The IS/MND found that farmland impacts resulting from the loss of the 13.3 acres "are not substantial; no further consideration of farmland impacts is required under the National Farmland Policy Act." Regarding cumulative impacts, the IS/MND noted that "though a small impact to farmland within this area, this [the elimination of 13.3 acres] would still contribute to the elimination of farmland. Because the City of Salinas has future development plans for this area, this loss is not being considered as a negative impact within the community".⁴

For the reasons set forth herein, we request that Mitigation Measure AG-1 not be applied to parcels 1 and 2 of the Salinas Travel Center project and that the FMMP classifications not serve as the basis for fashioning a threshold of significance for agricultural resource impacts - farming on these parcels is not feasible and any development thereon would not result in the conversion of farmland. Thank you for the opportunity to comment on the Draft EIR. We look forward to the City's good faith, reasoned responses to these comments and to the comments of other individuals and agencies. We encourage the City to continue its efforts to complete an informative and legally adequate environmental impact report.

Very truly yours,



Michael Harrington

cc: Rick Shuffield, Love's Travel Stops and Country Stores of California
Rob Oneto, Ruggeri-Jensen-Azar
Ron Sissem, EMC Planning Group and Project Manager

⁴ State of California Department of Transportation, "Initial Study with Proposed Mitigated Negative Declaration / Environmental Assessment", Airport Boulevard Interchange Project, pgs. 29-30.

Responses to Letter #4, Brian Finnegan & Michael J. Harrington, Attorneys at Law

Response #1: The draft EIR analysis of impacts on agricultural resources relies solely on the Department of Conservation (DOC) Farmland Mapping and Monitoring Program's 2014 Important Farmlands Map. The Important Farmlands Map is used as the basis for determining the classifications of agricultural soils within the project site, which in turn is the basis for determining the significance of impacts associated with conversion of those soils to non-agricultural use, and for associated mitigation as reflected in mitigation measure AG-1. As of April 2018, the 2014 Important Farmlands Map is the most recent available from the DOC.

City staff and its consultants have independently reviewed Caltrans' 2008 Appraisal Review Report referenced in the comment letter. Through that review, the City has verified that the Appraisal Review Report states that removing the irrigation infrastructure needed to supply water to enable continued farming within what are now parcels 1 and 2 was a necessary part of the interchange construction process. City staff also verified that the Appraisal Review Report concludes that the best and logical uses for the subject remainder parcels (parcels 1 and 2) would be for commercial and industrial development rather than continued agricultural use. This conclusion is based on the need to remove irrigation infrastructure, the small size of parcel 1, the adjacency of the parcels to existing urban uses within the city, and the location of the parcels within the City's Sphere of Influence (suggesting that annexation and development could occur in the shorter term).

Where additional information beyond that provided by Important Farmland Map information is utilized as part of a farmland conversion impact determination under CEQA, several variables are commonly considered. Among these are site specific factors such as site size, water resource availability, and adjacency to agricultural land. Regarding site size, the smaller the area to be converted, the less significant is the effect of conversion. Generally, conversion of small sites (e.g. sites that are less than 10 acres in size) does not contribute to the potential significance of conversion. The potential significance of conversion is reduced in the absence of available irrigation water supply and irrigation infrastructure. The potential significance of conversion is also reduced in cases where less than about 50 percent of the land within the immediate vicinity of a site to be converted is in agricultural use, as is the case with parcels 1 and 2. These factors are analogous to evidence included in the Appraisal Review Report which suggests that due to changes created by the interchange project, commercial and industrial development would be logical uses of land now within parcels 1 and 2 due to their size, absence of irrigation infrastructure, their adjacency to existing urban uses within the city limits, and their location within the City's Sphere of Influence.

The commenter states that parcels 1 and 2 have been fallow since 2009 when Caltrans acquired the land to construct the interchange improvements that created separate remainder parcels now identified as parcels 1 and 2. A review of Google Earth conducted in April 2018 shows that the parcels were still in production in September of 2009. Nevertheless, it is likely that farming ceased soon thereafter when Caltrans began construction on the interchange. Construction was completed in 2012. The fact that the parcels have been fallow for approximately eight years is considered to be additional indirect evidence that farming them has not been economically feasible since about 2010. The commenter makes reference to the IS/MND prepared by Caltrans for the interchange as further evidence that conversion of farmland within parcels 1 and 2 should not be considered a significant impact. The IS/MND concludes that the impact from conversion of the 13.3 acres of agricultural land purchased by Caltrans for the interchange project is not “substantial” based on a U.S. Department of Agriculture methodology. That methodology scores a range of variables that when weighted and combined, are used to determine significance. Inputs to the assessment were provided by the U.S. Natural Resources Conservation Service. The methodology assesses land evaluation criteria and site assessment criteria that are similar to, but differ to some extent from those summarized above. Examples of land evaluation criteria include the acreage of Important Farmland that would be converted to non-agricultural use. Examples of site assessment criteria include, but are not limited to: area in non-urban use, perimeter in non-urban use, percent of site being farmed, distance from urban built-up area, size of farm unit compared to average, creation of non-farmable farmland, and compatibility with existing agricultural use. The City considers the methodology to be a valid approach for determining significance. Given the fact that the agricultural resource conditions within parcels 1 and 2 were similar to those for the lands purchased by Caltrans for the interchange, it is logical to assume that the same methodology applied to parcels 1 and 2 would also have yielded a conclusion of “not substantial” impact for loss of agricultural land within those parcels.

Based on the information described above and the City’s independent judgement, the City concurs with the commenter that the 16.05 acres of land within parcels 1 and 2 identified in the draft EIR as Important Farmland (Prime Farmland and Farmland of Statewide Significance) should not be classified as Important Farmland for the purposes of assessing impacts of the proposed project. Therefore, conversion of that land to urban uses would not contribute to the determination of significant unavoidable impact from conversion of Important Farmland identified in the draft EIR. The significant unavoidable impact determination would still apply to the 17.07 acres of Important Farmland (Prime Farmland and Unique Farmland) within parcels 3 and 4 and mitigation measure AG-1 in the draft EIR remains applicable to partially mitigate this impact.

Based on the City’s determination, several changes to the draft EIR text, including mitigation measure AG-1, have been made. Please refer to Section 3.0, Changes to the Draft EIR.

April 5, 2018

Jill Miller, Senior Planner
City of Salinas Community Development Dept.
65 West Alisal Street
Salinas, CA 93901

Email: jill.miller@ci.salinas.ca.us

SUBJECT: DEIR Salinas Travel Center (#2016101058)

Dear Jill Miller:

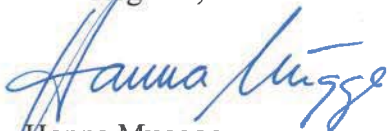
Thank you for providing the Monterey Bay Air Resources District (Air District) the opportunity to comment on the above-referenced document.

The Air District has reviewed the document and has the following comments:

1. Table 2-2 – Air Quality, Mitigation Measures, Page 2-7– The table indicates significant impacts due to the generation of fugitive dust emissions during construction. A suite of mitigation measures are presented. In addition, the Air District suggests using cleaner construction equipment for the project. This includes equipment that conforms to ARB’s Tier 4 emission standards. We further recommend that, whenever feasible, construction equipment use alternative fuels such as compressed natural gas, propane, electricity or biodiesel. This would have the added benefit of reducing diesel exhaust emissions. 1
2. Table 2-2 – GHG, Mitigation Measures, Page 2-13 – Due to the significant expected GHG Emissions, please keep in close communication with the Air District to discuss future mitigation strategies as necessary. 2
3. Table 2-2 -- Transportation, Mitigation Measures, Page 2-19 –As mentioned in the report, a traffic signal will be a necessary mitigation measure at the intersection of Roy Diaz Street/De La Torre (South), to improve the status of LOS from F to an acceptable A (during PM peak hour). To further reduce future congestion, the Air District highly recommends using Adaptive Signal Control Technology (ASCT) at this intersection. According to the US Dept. of Transportation, ASCT has many benefits over conventional signal systems, such as improving traffic flow, faster responses to traffic conditions, and cutting costs. 3

Feel free to contact me if you have any questions. I can be reached at (831) 718-8021 or hmuegge@mbard.org.

Best Regards,



Hanna Muegge
Air Quality Planner

cc: David Frisbey, Planning & Air Monitoring Manager

Responses to Letter #5, Monterey Bay Air Resources District

Response #1: Mitigation measure AQ-1 has been modified to include the air district's recommendation. Please refer to Section 3.0, Changes to the Draft EIR.

Response #2: Mitigation measure GHG-1 specifies the performance standards that must be met by future individual project developers to ensure GHG emissions are mitigated to a less-than-significant level. City may consult with the air district regarding the content and/or efficacy of GHG reduction measures to be employed by developers of future individual projects.

Response #3: The City will review the improvement plans for the intersection improvements and will consider the air district's recommendation regarding employing Adaptive Signal Control Technology.

DEPARTMENT OF TRANSPORTATION

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<http://www.dot.ca.gov/dist05/>



*Serious drought
Help save water!*

April 6, 2018

MON-101-85.62
SCH#2016101058

Jill Miller
City of Salinas Planning Department
65 West Alisal Street
Salinas, CA 93901

COMMENTS ON SALINAS TRAVEL STOP DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above referenced project and offers the following comments in response to your summary of impacts. Caltrans appreciates the opportunity to review and comment on this project. Caltrans supports local development that is consistent with improving freight efficiency and increasing competitiveness of California's freight system. To ensure a sustainable transportation system, Caltrans supports new freight and fuel infrastructure and other local economic development opportunities.

- 1. The Roy Diaz Street and north bound US 101 Ramp intersection calls for a traffic signal which is in Caltrans right-of-way. An Intersection Control Evaluation (ICE) review will be required by Caltrans for this intersection to determine the correct intersection control solution. This will include an analysis of such things as signals, stop signs, and roundabouts. The mitigation suggestion for a signal is premature without an ICE evaluation. | 1
- 2. The Highway 68 and East Blanco Road intersection mitigation is to add a second north bound left turn lane. Caltrans recommends investigating extending the turn lane instead of adding an additional turn lane. | 2
- 3. For hotel trip generation, typically 100% occupancy should be assumed for as the worst case scenario for a project. Please provide the backup data that was mentioned in the report to confirm that 80% occupancy is reasonable. | 3
- 4. Please reevaluate existing traffic counts provided in the report to determine if the correct truck percentages were utilized on each movement and at each approach leg. For example, the Highway 68/Blanco Road intersection had a 0% truck percentage in the traffic study for articulated trucks but should have 2% minimum. | 4

Jill Miller
April 6, 2018
Page 2

5. Caltrans has significant opening day concerns for the travel center especially with the approximate 4,965 new daily vehicle trips including 508 and 592 new vehicle trips during the AM and PM peak hours. We feel further discussion should be included that addresses immediate impacts to the southbound Highway 101/Airport Boulevard/Terven Avenue interchange. Existing conditions already include mainline queuing on these ramps; while there is a long-term solution proposed as part of the city's traffic impact fee program, because of the immediate and largescale impact this development will have on opening day, the traffic study should disclose these more openly and suggest any short-term enhancements to address project-specific impacts that are appropriate.

5

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3157 or email christopher.bjornstad@dot.ca.gov.

Sincerely,



Chris Bjornstad
Transportation Planner
District 5

cc: Grant Leonard (TAMC)

Responses to Letter #6, California Department of Transportation (Caltrans)

Response #1: Intersection Control Evaluation (ICE) is an analysis process used by transportation agencies, including Caltrans, to consider options to traditional intersection controls (e.g. traffic signals). The ICE analysis process considers a range of variables to investigate more balanced solutions to intersection control. These variables include, but are not limited to: context, desired performance outcomes, cost-effectiveness, and sustainability. A goal is to consider options to traditional traffic signals and other intersection improvements such road widening on approaches to intersections. Roundabouts may be one option considered in lieu of traffic signals.

Mitigation measures TRANS-3 and TRANS-4, which both mitigate traffic impacts at the subject intersection, have been modified to incorporate Caltrans' ICE requirement. Please refer to Section 3.0, Changes to the Draft EIR, for the modifications.

Response #2: The intersection of State Route 68 and East Blanco Road currently operates at LOS D, which is below the Caltrans minimum standard. Therefore, the addition of any proposed project traffic to this intersection is considered a significant impact. A significant impact by Caltrans standards is said to be satisfactorily mitigated when measures are implemented that would restore intersection level of service to better than background conditions. The improvement mentioned in the Caltrans comment, extending the northbound left-turn lane, was reviewed by Hexagon Transportation Engineers, the City's consulting traffic engineer, who determined that the improvement would not restore the intersection delay and level of service to better than background conditions. The proposed mitigation measure, the addition of a second northbound left-turn lane, would satisfactorily mitigate the project impact.

Response #3: The traffic impact analysis included as Appendix G of the draft EIR assumes 80 percent of the hotel rooms would be occupied on average. The 80 percent occupancy rate is a conservative assumption. The project Applicant provided a document to City staff entitled, "STR Trend Report – Salinas California" prepared by STR, Inc. in December 2016. This document shows the existing hotels in Salinas had an average occupancy rate of just over 65 percent in both 2015 and 2016. Thus, the 80 percent rate used in the traffic impact analysis is conservative relative to actual data for the most recent years for which data was available at the time the traffic impact analysis was prepared.

Response #4: The traffic impact analysis reflects the effects of heavy vehicles based on the observed truck percentages at each intersection. The intersection turning-movement counts conducted for this study classify vehicles into three categories: lights (motorcycles, cars, pick-up trucks, light goods trucks), mediums (buses and single-unit trucks), and articulated trucks (semis). The City also provided traffic count data for selected locations that classify vehicles into two categories: 2-3 axle vehicles and 4+ axle vehicles. The heavy vehicle

percentages used in the traffic analysis are based on the percentage of articulated trucks or the percentage of 4+ axle vehicles. The usage of heavy vehicle factors reflects the additional space and slower acceleration of large vehicles. Some, but not all, of the vehicles in the mediums or 2-3 axle categories may also be considered heavy vehicles if they have more than four tires on the road. While a vehicle with two axles and six tires is considered a heavy vehicle according to the definition contained in the 2010 Caltrans Highway Capacity Manual, these vehicles have similar operating characteristics to a passenger vehicle, and thus have minimal effect on traffic flow.

For comparison purposes, the average delay and level of service at the intersection of State Route 68 and Blanco Road was recalculated with a heavy vehicle percentage that reflects both medium and articulated trucks. The average delay with the revised heavy vehicle factor is within 0.7 seconds of the original analysis results presented in the draft EIR. In addition, the incremental increase in delay resulting from the addition of project trips with the revised heavy vehicle factor was nearly identical (within 0.1 seconds) to that presented in the draft EIR. Therefore, the analysis of study intersections was not revised to reflect a higher percentage of heavy vehicles because the study conclusions regarding proposed project impacts and mitigation measures are not expected to change. This is considered a conservative analysis since it may overstate the percentage and/or effect of heavy vehicles.

Response #5: The City's traffic impact fee program is designed to mitigate the traffic impacts of cumulative development within the city, including development of the project site. The traffic fee program includes improvements to intersections and streets throughout the city and to Caltrans facilities, such as the U.S. Highway 101/Airport Boulevard/Terven Avenue interchange, which are projected to be impacted under cumulative development conditions. CEQA Guidelines section 15130(a)(3) explicitly states that a project's contribution to a significant cumulative impact will be rendered less-than-cumulatively considerable if the project is required to implement or fund its fair-share of a mitigation measure designed to alleviate the cumulative impact. Thus, payment of the City's traffic impact fee addresses the proposed project impact at the subject interchange. If the City's traffic fee program did not include improvements at the interchange, the proposed project would be directly responsible for funding and implementing improvements needed to mitigate its individual impact at the interchange.

Though the significant impact on operations of the Terven Avenue (Airport Boulevard)/U.S. Highway 101 interchange southbound ramp was already identified in the draft EIR, and though queuing is not in itself an environmental impact subject to CEQA, the City nevertheless recognizes Caltrans' concern about queuing on the ramp in the interim period before full improvements to the interchange as identified in the City's Traffic Improvement Program are completed. For this reason, as a condition of project approval, the City will

require that interim effects of the project on queuing be evaluated. If queuing is an issue, options for appropriate short-term, enhancements will be investigated and implemented if feasible in coordination with Caltrans. The proposed condition of approval is as follows:

“Prior to issuance of a grading permit for the first project approved within the project site, the developer of that project shall conduct an analysis of potential queuing effects at the Terven Avenue (Airport Boulevard)/U.S. Highway 101 interchange southbound ramp at buildout of the project site. If adverse queuing effects are possible, options for short-term, feasible, enhancements shall be identified, along with their respective costs and implementation timeframe. The analysis shall be subject to review and approval of the City and Caltrans. The City and Caltrans shall coordinate to determine the feasibility of the enhancement options and shall select the preferred option for implementation. The preferred option shall be funded by the developer of the subject project and shall be completed prior to issuance of an occupancy permit for that project, unless alternative timing is deemed acceptable by the City and Caltrans. Costs for conducting the analysis and for the short-term enhancement improvement shall be reimbursed to the project developer through a City traffic impact fee reduction or through an alternative mechanism (e.g. fair share funding by all developers within the specific plan) to be determined by the City in collaboration with the project developer.”

3.0

Changes to the Draft EIR

3.1 CEQA REQUIREMENTS

CEQA Guidelines section 15132 requires that a final EIR contain either the draft EIR or a revision of the draft EIR. This final EIR incorporates the draft EIR by reference and includes revisions to the draft EIR required in response to comments provided in Section 2.0.

3.2 DRAFT EIR REVISIONS

This section contains revisions to text, tables, and/or graphics from the draft EIR. Additions to the text are presented in underlined text (underline) and deletions are shown in strikethrough text (~~strikethrough~~). The location of the original text in the draft EIR is identified before each revision.

Text on page 4-2 of the draft EIR is revised as follows:

The Monterey County 2010 General Plan designates the project site as Farmlands, ~~40 Acre Minimum, Urban Reserve. combined with an Urban Reserve designation.~~ The zoning districts of for the project site ~~are~~ is Farmland, 40 Acre Minimum Building Site Farmlands (F), ~~40 acre minimum (40) combined with Urban Reserve (UR).~~

Text on page 6-3 of the draft EIR is revised as follows:

Land within parcels 1 and 2 ~~has~~ been fallow since approximately 2010 when Caltrans ~~completed its~~ began construction of the U.S. Highway 101 Ramp 326A improvements ~~in 2012.~~

Text on page 6-12 of the draft EIR is revised as follows:

The proposed project would convert 14.57 ~~24.89~~ acres of Prime Farmland, ~~5.73 acres of Farmland of Statewide Importance,~~ and 2.50 acres of Unique Farmland to non-agricultural use as mapped by the FMMP. The balance of 0.94 acres is classified as Urban and Built Up land. The proposed project would convert a total of 17.07 ~~33.12~~ acres of "Farmland" (defined to be comprised of these two ~~three~~ farmland classifications) to non-agricultural use.

Text on page 6-15 of the draft EIR is revised as follows:

IMPACT Convert a Total of ~~17.07~~ ~~33.42~~ Acres of Farmland Comprised of ~~14.57~~ ~~24.89~~ Acres of Prime Farmland, ~~5.73~~ Acres of Farmland of Statewide Importance, and 2.50 Acres of Unique Farmland to Non-Agricultural Use (Significant and Unavoidable)

~~Development of parcels 3 and 4~~The proposed project would convert ~~14.57~~ ~~24.89~~ acres of Prime Farmland, ~~5.73~~ acres of Farmland of Statewide Importance, and 2.50 acres of Unique Farmland to non-agricultural use. This is considered a significant adverse environmental impact. Implementation of the following mitigation measure would partially mitigate the impact.

AG-1 Developers of ~~the proposed hotel project, the travel center project, and future~~ projects within parcels 3 and 4 shall provide mitigation for conversion of Farmland (Prime Farmland, ~~Farmland of Statewide Importance,~~ and Unique Farmland) to non-agricultural use. At a minimum, mitigation shall include dedication of a permanent agricultural conservation easement to a qualified third-party farmland conservation entity on off-site agricultural land of equal or better quality at a ratio of 1:1. Individual developers shall demonstrate compliance with this mitigation measure to the Community Development Director prior to issuance of grading permits for individual projects.

Text on page 7-20 of the draft EIR is revised as follows:

Implementation of this mitigation measure would reduce fugitive dust emissions from earthmoving activities by approximately 50 percent, depending on the activities conducted, which would ensure that the proposed project does not exceed the air district thresholds for short-term construction emissions. For example, watering active, unpaved construction areas with full coverage can reduce fugitive PM₁₀ from construction equipment and other mobile sources by 50 percent, reducing daily emissions from 70 pounds/day/acre to 35 pounds/day/acre (Monterey Bay Unified Air Pollution Control District 2008, p. 8-2). In addition to the required measures, the air district also recommends using cleaner construction equipment that conforms to the California Air Resources Board's Tier 4 emission standards and construction equipment which uses alternative fuels to further reduce diesel exhaust emissions.

Text on page 9-14 of the draft EIR is revised as follows:

CR-2 If human remains are found during construction within the project site, there shall be no further excavation or disturbance of the construction site or any nearby area reasonably suspected to overlie adjacent human remains until an archeological monitor and the coroner of Monterey County are contacted. If it is determined that the remains are Native American, the coroner shall contact the

Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code section 5097.98. The landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if: a) the Native American Heritage Commission is unable to identify a MLD or the MLD failed to make a recommendation within ~~24~~ 48 hours after being notified by the commission; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Text on page 16-42 to 16-43 of the draft EIR is revised as follows:

- TRANS-3 Prior to issuance of building permits, all developers of individual projects within the specific plan area shall pay a fair share of the cost of a traffic signal (or other traffic control as may be deemed appropriate based on the results of an Intersection Control Evaluation) at the Roy Diaz Street/U.S. Highway 101 northbound ramps. The Intersection Control Evaluation shall be prepared by either the hotel developer or the travel center developer (whichever is first to request a building permit). The Intersection Control Evaluation will be subject to review by Caltrans and City staff for selection of the final traffic control solution. This traffic signal improvement would restore the intersection from unacceptable LOS F to an acceptable LOS C during the PM peak hour. Any other traffic control to be considered based on the Intersection Control Analysis must restore operating conditions at the intersection to the minimum LOS D or better.
- TRANS-4 Prior to issuance of a building permit, the developer of the future individual project within ~~Phase 2 of the project (within~~ parcels 3 or 4) whose traffic generation represents more than 82 percent of the projected PM peak traffic volume for development within those parcels Phase-2 as shown in TIA Table 15, Fair Share Analysis, shall construct a traffic signal (or other acceptable traffic control as may be warranted based on the Intersection Control Evaluation identified in mitigation measure TRANS-3) at Roy Diaz Street/U.S. Highway 101 northbound ramps. The developer shall enter into a reimbursement agreement with the City of Salinas for reimbursement of costs when fair-share costs are paid by developers of all other projects within the specific plan area as required

pursuant to mitigation measure TRANS-3. Traffic signal design (or design of any other traffic control improvement identified through the Intersection Control Evaluation) and construction shall be subject to review and approval by the City of Salinas Public Works Department. The City of Salinas Public Works Department shall ensure that the improvements have been completed prior to issuance of an occupancy permit for the subject project.

Text on page 20-8 of the draft EIR is revised as follows:

Project Contribution to Cumulative Impacts

The proposed project would result in the permanent conversion of approximately 17.07 ~~33~~ acres of important farmland to non-agricultural uses as described in Section 6.0, Agricultural Resources. Mitigation measure AG-1 in Section 6.0 requires that applicants for future development within the project site dedicate permanent conservation easements to a qualified third-party farmland conservation entity on off-site agricultural land of equal or better quality at a minimum ratio of 1:1. However, this mitigation measure does not reduce the significant impact to less than significant, as the project will still result in the net loss of 17.07 ~~33~~ acres of important farmland.

Text on page 24-2 of the draft EIR is revised as follows:

Important Farmland

The proposed project would have significant, adverse, and unavoidable impacts to 17.07 ~~33.04~~ acres of on-site important farmland (14.57~~24.67~~ acres of Prime Farmland, ~~5.73~~ acres of Farmland of Statewide Importance, and 2.50 acres of Unique Farmland).

Text on page 24-12 of the draft EIR is revised as follows:

Agricultural Resources

This alternative would result in development of the project site at an intensity of development and land coverage that is similar to the proposed project, which is the conversion of 14.57~~24.89~~ acres of Prime Farmland, ~~5.73~~ acres of Farmland of Statewide Importance, and 2.50 acres of Unique Farmland to non-agricultural use.

Text on page 24-18 of the draft EIR is revised as follows:

Agricultural Resources

This alternative would avoid conversion of 17.07~~approximately 18~~ acres of important farmland located within parcels 3 and 4. This alternative would substantially lessen the significant and unavoidable impact of the proposed project ~~wherein a total of 33.12 acres of important farmland would be converted to urban use~~. This alternative would not substantially lessen potential land use conflicts with on-going agricultural operations to the south of parcels 3 and 4, as the same types of conflicts would be possible between developments on parcels 1 and 2 and on-going agricultural operations on parcels 3 and 4.

~~While both the proposed project and this alternative would result in significant unavoidable impacts from conversion of important farmland, By substantially lessening avoiding conversion of important farmland to non-agricultural use, this alternative is superior to the proposed project from an agricultural resources perspective. Text on page 24-25 of the draft EIR is revised as follows:~~

Agricultural Resources

This alternative would avoid conversion of approximately 14.04~~90~~ acres of important farmland located within parcel 4, or about 82~~44~~ percent of the approximately 17.07~~33~~ acres of important farmland that would be converted with the proposed project. This alternative would thus substantially lessen the significant and unavoidable impact of the proposed project ~~wherein a total of 19.08 acres of important farmland would be converted to urban use.~~ The impact would remain significant and unavoidable, however, even with mitigation.

Text on page 24-31 of the draft EIR is revised as follows:

Agricultural Resources

This alternative would avoid conversion of approximately 19.17.07 acres of important farmland located within parcels ~~1, 3,~~ and 4.

This alternative would not substantially lessen potential land use conflicts with on-going agricultural operations to the south of parcels 3 and 4, as the same types of conflicts would be possible between development on parcel 2 and on-going agricultural operations on parcels 3 and 4. The area of potential conflict would just be shifted northward.

~~While both the proposed project and this alternative would result in significant unavoidable impacts from conversion of important farmland, By avoiding substantially lessening conversion of important farmland to non-agricultural use, this alternative is superior to the proposed project from an agricultural resources perspective.~~

Text on page 24-38 of the draft EIR is revised as follows:

Agricultural Resources						
Conversion of On-site Important Farmland	Significant and Unavoidable, with Mitigation	No Impact (above baseline conditions)	Significant and Unavoidable, with Mitigation	Avoid Substantially Lessen No Impact Significant and Unavoidable	Substantially Lessen Significant and Unavoidable	Avoid Substantially Lessen No Impact Significant and Unavoidable

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4.0

Changes to the Summary

Where changes to the draft EIR text described in Section 3.0, Changes to the Draft EIR also require changes to the Summary contained in the draft EIR, the Summary changes are identified below.

Text on page 2-5 of the draft EIR is revised as follows:

The no project alternative is the environmentally superior alternative. It is superior because it would avoid all impacts of the proposed project. Of the remaining alternatives, Alternative 4, Reduced Project Size (Parcel 1–Hotel, Parcel 2–Travel Center, and Parcel 3–General Industrial Only) is the environmentally superior alternative. This alternative substantially lessens the significant unavoidable impact of the proposed project from conversion of important farmland to non-agricultural use. However, Alternative 4 also creates a significant unavoidable impact on groundwater by increasing demand for groundwater pumping. Nevertheless, this effect of Alternative 4 is reduced relative to all other alternatives. ~~except Alternative 2, but Alternative 2 does not substantially lessen the significant unavoidable impact of the proposed project from conversion of important farmland.~~

Text in Table 2-2, Summary of Significant Impacts and Mitigation Measures starting on page 2-7 of the draft EIR is revised as shown on the following page:

Table 2-2 Significant Impacts and Mitigation Measures

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
Agricultural Resources			
Convert 24.89 14.57 Acres of Prime Farmland, 5.73 Acres of Farmland of Statewide Importance, and 2.50 Acres of Unique Farmland to Non-Agricultural Use	Significant	AG-1 Developers of the proposed hotel project, the travel center project, and future projects within parcels 3 and 4 shall provide mitigation for conversion of Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use. At a minimum, mitigation shall include dedication of a permanent agricultural conservation easement to a qualified third-party farmland conservation entity on off-site agricultural land of equal or better quality at a ratio of 1:1. Individual developers shall demonstrate compliance with this mitigation measure to the Community Development Director prior to issuance of grading permits for individual projects.	Significant and Unavoidable
Air Quality			
Generation of Fugitive Dust Emissions from Grading on more than 2.2 Acres and Construction on more than 8.1 Acres	Significant	<p>AQ-1 To reduce fugitive dust emissions from grading and construction activities associated with the proposed hotel and travel center projects, and from future projects within parcels 3 and 4, the following measures shall be included on all grading and construction plans for these projects, prior to issuance of a grading permit:</p> <ul style="list-style-type: none"> ▪ Water areas of active disturbed soils at least twice daily or as necessary to prevent visible dust leaving the site, using raw or recycled water when feasible. ▪ Apply chemical soil stabilizers or dust suppressants on disturbed soils that will not be actively graded for a period of four or more consecutive days. ▪ Apply non-toxic binders and/or hydro seed to disturbed soils on which grading is completed, but on which more than four days will pass prior to paving, foundation construction, or placement of other permanent cover. ▪ Cover or otherwise stabilize stockpiles which will not be actively used for a period of four or more consecutive days, or water at least twice daily as necessary to prevent visible dust leaving the site, using raw or recycled water when feasible. ▪ Maintain at least 2'0" of freeboard and cover all trucks hauling dirt, sand, or loose materials. ▪ Install wheel washers at all construction site exit points, and sweep streets if visible soil material is carried onto paved surfaces. ▪ Stop grading and earth moving if winds exceed 15 miles per hour. 	Less than Significant

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<ul style="list-style-type: none"> ▪ Pave roads, driveways, and parking areas at the earliest point feasible within the construction schedule. ▪ Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The phone number of the air district shall also be visible to ensure compliance with Rule 402 (Nuisance). 	
Biological Resources			
Loss of a Congdon's Tarplant Population	Significant	<p>BIO-1 To compensate for loss of a Congdon's tarplant population, the developer of parcel 1 on which the population is located shall retain a qualified biologist or native plant specialist to collect seed from all annual Congdon's tarplant individuals within the impact area at the optimal time (after its blooming period) and prior to issuance of a grading permit. The project developer and the Community Development Director shall oversee selection of an appropriate mitigation area, preferably on the project site, or in the immediate vicinity, that would not be disturbed in the future.</p> <p>After City approval of the proposed mitigation area, a qualified biologist shall develop a Habitat Management Plan detailing optimal methods for Congdon's tarplant seed collection from the impact area, preparation of the mitigation area, and seed installation at the mitigation area. The Habitat Management Plan shall also include maintenance measures to manage the rare plant occurrence for long-term protection and persistence at the mitigation area, which for this species would likely include periodic site disturbance. Collected seed shall be installed at the mitigation area at the optimal time. Topsoil from the on-site occurrence location shall also be salvaged (if practical) for use in the mitigation area.</p> <p>The Habitat Management Plan shall require at a minimum three years of annual monitoring by a qualified biologist during the plant's peak blooming period to ensure that mitigation was successful and that long-term maintenance procedures specified in the plan are creating conditions that support survival of the transplanted Congdon's tarplant population. Though the population size of this annual plant is expected to vary in the mitigation area from year to year depending on environmental conditions, because 103 individual plants were observed in the impact area in 2016, at least that many individuals must exist in the mitigation area during at least one of the three years following installation. If this success criteria is not achieved, the project developer shall coordinate with the City to implement remedial mitigation through revision of the Habitat Management Plan, collection of additional seed from a local population, and repeated</p>	Less than Significant

4.0 Changes to the Summary

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>installation in the mitigation area, followed by another three years of annual monitoring. This process shall be extended as needed until all success criteria contained in the Habitat Management Plan are achieved, including the successful establishment of at least 103 individual plants.</p> <p>The project applicant shall be responsible for implementation of this mitigation measure with oversight by the Community Development Director. Compliance with this measure shall be documented and submitted to the City Community Development Director.</p>	
Potential Loss of Burrowing Owls	Significant	<p>BIO-2 To avoid/minimize potential impacts to burrowing owls, individual project developers will retain a qualified biologist to conduct a two-visit (i.e. morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to their individual project sites no less than 14 days prior to the start of construction. Surveys will be conducted according to methods described in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). If these pre-construction “take avoidance” surveys performed during the breeding season (February through August) or the non-breeding season (September through January) locate occupied burrows in or near construction areas, the qualified biologist will interpret survey results and develop a plan for project-specific avoidance, minimization, and compensation for habitat loss. The CDFW will be notified of the observation and provided a copy of the plan.</p> <p>Where there is insufficient habitat on, adjacent to, or near project sites where burrowing owls will be impacted, acquisition of off-site mitigation lands with occupied burrowing owl habitat may be required in consultation with the CDFW. Compensation may take the form of: a) acquiring and dedicating lands into conservation easements; b) purchasing mitigation credits at compensation ratios that have been approved by the CDFW; or c) preserving area contiguous or near the acreage lost.</p>	Less than Significant
Potential Loss or Disturbance of Protected Nesting Birds	Significant	<p>BIO-3 To avoid possible impacts to nesting birds on and adjacent to the project site, if noise generation, ground disturbance, vegetation removal, or other construction activities begin during the nesting bird season (February 1 to September 15), or if construction activities are suspended for at least two weeks and recommence during the nesting bird season, individual project developers shall retain a qualified biologist acceptable to the City to conduct a pre-construction survey for nesting birds. The survey shall be performed within suitable nesting habitat areas within individual development sites and within suitable nesting habitat areas adjacent those sites where project activities may have potential to indirectly impact nesting birds to ensure that no active nests would be disturbed during project implementation. The surveys shall be conducted no more than one week prior to the initiation of disturbance or construction activities on</p>	Less than Significant

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>individual project sites.</p> <p>If no active bird nests are detected during a survey, then project activities can proceed as scheduled. However, if an active bird nest of a native species is detected during a survey, a plan will be developed to ensure that nesting birds are not adversely impacted by the project. The plan will include measures for bird nest avoidance prepared by the qualified biologist to determine and clearly delineate an appropriately sized, temporary protective buffer area around each active nest, depending on the nesting bird species, existing site conditions, and type of proposed disturbance or construction activities. The protective buffer area around an active bird nest is typically 75-250 feet, determined at the discretion of the qualified biologist.</p> <p>To ensure that no inadvertent impacts to an active bird nest will occur, no disturbance and/or construction activities shall occur within the protective buffer area(s) until the juvenile birds have fledged (left the nest), and there is no evidence of a second attempt at nesting, as determined by the qualified biologist.</p> <p>Individual project developers shall be responsible for implementation of this mitigation measure prior to issuance of a grading permit, with oversight by the Community Development Director.</p>	
<p>Loss of Waters of the State and U.S. Potentially under Jurisdiction of the RWQCB [0.23-acre] and the USACE [0.08-acre]</p>	<p>Significant</p>	<p>BIO-4 Prior to initiation of ground disturbance or construction activities, the developer of parcel 2 shall retain a qualified biologist to determine the extent of the drainage ditch regulated by the USACE and RWQCB. If the USACE claims jurisdiction, the developer shall retain a qualified biologist to obtain a Clean Water Act Section 404 Nationwide Permit. If the proposed ditch impact does not qualify for a Nationwide Permit, the developer shall proceed with the qualified biologist in obtaining an Individual Permit from the USACE. The developer shall then retain a qualified biologist to coordinate with the Central Coast RWQCB to obtain a Clean Water Act Section 401 Water Quality Certification.</p> <p>To compensate for temporary and/or permanent impacts to wetlands and other waters of the U.S. that will be impacted as a result of the proposed project, mitigation will be provided as required by the regulatory permits. Mitigation would be provided through one of the following mechanisms:</p> <ol style="list-style-type: none"> a. A Wetland Mitigation and Monitoring Plan will be developed that will outline mitigation and monitoring obligations for temporary impacts to wetlands and other waters as a result of construction activities. The Wetland Mitigation and Monitoring Plan would include thresholds of success, monitoring and reporting requirements, and site-specific plans to compensate for wetland losses resulting from the project. 	<p>Less than Significant</p>

4.0 Changes to the Summary

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>The Wetland Mitigation and Monitoring Plan will be submitted to the appropriate regulatory agencies for review and approval during the permit application process.</p> <p>b. To compensate for permanent impacts, the purchase and/or dedication of land to provide suitable wetland restoration or creation will ensure a no net loss of wetland values or functions. If restoration is available and feasible, a minimum 1:1 impact to mitigation ratio would apply to projects for which mitigation is provided in advance.</p> <p>The developer of parcel 2 shall comply with terms and conditions of the permits, including measures to protect and maintain water quality, restoration of work sites, and mitigation to offset temporary and/or permanent wetland impacts. The developer shall be responsible for implementation of this mitigation measure prior to issuance of a grading permit, with oversight by the Community Development Director.</p>	
Cultural Resources			
<p>Potential for Construction Activities Such as Excavations, Grading, or Trenching Associated with Development within the Project Site to Adversely Affect Historical Resources and/or Unique Archaeological Resources</p>	<p>Significant</p>	<p>CR-1 The following language shall be included in any permit associated with earth moving activities for development projects proposed within the project site:</p> <p>In the event that evidence of archaeological or historical features or deposits (e.g., ceramic shard, trash scatters, lithic scatters) are uncovered during excavation and/or grading, all work shall stop in the area of the subject property until an appropriate data recovery program can be developed and implemented by a qualified archaeologist. This archaeologist shall determine whether the uncovered deposits or features qualify as either "historical resources" within the meaning of CEQA Guidelines section 15064.5, subdivision (a), "unique archaeological resources" as defined in Public Resources Code section 21083.2, subdivision (g), or "tribal cultural resources," as defined in Public Resources Code section 21074. If historical resources, unique archaeological resources, or tribal cultural resources are present, the project proponent shall preserve any such resources or implement any feasible mitigation measures identified by the archaeologist and imposed by the City. Recommended mitigation measures shall be reviewed by the Community Development Director and shall be approved if feasible in light of project design, logistics, and cost considerations and, if approved, shall be implemented and completed prior to approval of a grading permit, unless otherwise directed by the Community Development Director. Data recovery shall be an option if preservation in place is infeasible. Where resources have been determined to be "unique archaeological resources" but not "historical resources" or "tribal cultural resources," the project proponent's obligations shall be limited as set forth in Public Resources Code section 21083.2, subdivisions (d), (e), and (f).</p>	<p>Less than Significant</p>

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
<p>Potential for Disturbance of Unknown Native American Human Remains from Construction Activities Including Grading and Excavations within the Project Site</p>	<p>Significant</p>	<p>CR-2 If human remains are found during construction within the project site, there shall be no further excavation or disturbance of the construction site or any nearby area reasonably suspected to overlie adjacent human remains until an archeological monitor and the coroner of Monterey County are contacted. If it is determined that the remains are Native American, the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code section 5097.98. The landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if: a) the Native American Heritage Commission is unable to identify a MLD or the MLD failed to make a recommendation within 24 48 hours after being notified by the commission; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.</p>	<p>Less than Significant</p>
<p>Potential for Destruction or Loss of Unique Paleontological Resources from Ground Disturbing Development Activities within Project Site</p>	<p>Significant</p>	<p>CR-3 The following language shall be included in any permit associated with earth moving activities for development projects proposed within the annexation area: In the event that evidence of paleontological resources are uncovered during excavation and/or grading, all work shall stop in the immediate area until a qualified paleontologist can assess the scientific significance of the paleontological resources and, if they are significant, until an appropriate data recovery program can be developed and implemented. The Community Development Director shall ensure that the permit language has been included and shall ensure that the appropriate data recovery program is implemented if significant paleontological resources are uncovered.</p>	<p>Less than Significant</p>

4.0 Changes to the Summary

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
Greenhouse Gas Emissions			
Project-Generated GHG Emissions that Would Impede Attainment of State GHG Emissions Reduction Goals	Significant	<p>GHG-1 Prior to issuance of a building permit for each individual project proposed within the project site, individual project developers shall prepare a Greenhouse Gas (GHG) Reduction Plan for their respective projects. Each GHG Reduction Plan shall be designed to reduce GHG emissions from each individual project to 3.51 MT CO₂e per service population per year. This threshold is based on an assumed buildout year of 2025 for individual projects. A higher threshold of significance may be warranted for projects that build out prior to 2025 based on Senate Bill 32 and/or other legislation that may be adopted prior to the buildout year for individual projects. For such projects, individual project developers may provide substantial evidence that a higher threshold of significance is warranted. The evidence shall be based on the threshold of significance determination methodology utilized in this EIR. Any proposed change in the threshold of significance shall be subject to review and approval of the City of Salinas Planning Commission.</p> <p>The GHG Reduction Plan shall include the GHG reduction measures listed below and shall quantify the project-specific GHG reductions achieved with the measures. Additional measures may be added by the developer. Reductions from measures required by regulations of the City of Salinas (e.g. facilities trip reduction plan) and/or of the state (e.g. SB 350 renewable energy standard for 2030 and Advanced Clean Car Standards) may be included. The Reduction Plan shall list all of the required and additional measures (if any), identify reductions associated with each, and provide evidence supporting the level of reduction calculated for each. All measures within the control of individual project applicants shall be implemented and operational prior to occupancy of the associated project.</p> <p>The following on-site GHG reduction measures shall be included in the plan. Other feasible reduction measures may be substituted for the measures listed below provided they achieve a similar volume of reductions:</p> <ul style="list-style-type: none"> ▪ Design buildings to exceed the Title 24 energy efficiency standards currently in effect by at least 10 percent. The 2016 Building Energy Efficiency Standards are the standards currently in effect. ▪ Provide on-site renewable energy to replace demand for grid electricity. Rooftop solar installations and/or ground-mounted installations may be feasible options for on-site energy production. 	

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<ul style="list-style-type: none"> ▪ Exceed higher than mandated parking lot and area energy efficient lighting standards. ▪ Incorporate indoor water conservation measures, such as use of ultra-low-flow toilets and faucets (bathrooms). ▪ Incorporate low flow irrigation that exceeds requirements of the City of Salinas Zoning Code Section 37-50.330 and the state Water Efficient Landscape Ordinance. ▪ Install Energy Star appliances in all buildings. ▪ Include the necessary infrastructure in the project design (e.g. physical design, energy, and fueling) to support the deployment of zero emission technologies now and into the future, including electric vehicle charging stations for passenger cars and heavy-duty trucks (the latter especially for the proposed travel center project), zero emission battery electric and hybrid electric passenger vehicles and electric forklifts. ▪ Electrify loading docks. ▪ Provide and prioritize locations of parking for electric cars and trucks. ▪ Include sufficient plug-in capabilities for transport refrigeration units to eliminate the time that a refrigeration system is powered by a fossil-fueled internal combustion engine while at the site (proposed travel center project only). <p>If the on-site GHG emissions reduction measures identified in each GHG reduction plan combined with reductions from City of Salinas and/or state regulatory reductions are insufficient to reduce project emissions to below the threshold of significance, individual project developers may then secure additional emissions reductions through off-site GHG reduction programs and/or through purchase of carbon off-sets .</p> <p>Each GHG Reduction Plan is subject to review and approval by the Community Development Director prior to approval of building permits for the subject project.</p>	

4.0 Changes to the Summary

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
Hazards and Hazardous Materials			
<p>Pose Hazards to Public Health or the Environment from Exposure to Agricultural Chemical Residues in Site Soils during Construction</p>	<p>Significant</p>	<p>HAZ-1 Prior to the issuance of grading permits for development within parcels 1, 3 and 4, developers of individual projects shall prepare Phase I Environmental Site Assessments to determine the potential for or actual presence of agricultural chemical residues that could pose a risk to the public health or workers. If potential or actual hazardous materials conditions are identified that require preparation of Phase II Environmental Site Assessments, future individual project developers shall be responsible for conducting the assessments and for implementing all recommendations and requirements for remediation of hazardous materials conditions identified therein. Performance standards in the form of Environmental Screening Levels utilized by the San Francisco Bay Area Regional Water Quality Control Board and identified in the <i>User's Guide: Derivation and Application of Environmental Screening Levels</i> will be used to determine whether hazardous material conditions that pose a threat to public health and safety are present and as a guide for clean-up levels that must be attained to remediate such conditions. Hazardous materials removed from the site shall be managed consistent with regulations contained in the California Code of Regulations, Title 22 Division 4.5. Certification that remediation actions have been completed shall be provided to the City of Salinas Community Development Director prior to issuance of a grading permit.</p> <p>HAZ-2 Prior to the issuance of grading permits for development within parcel 2, the project developer shall prepare a Phase II Environmental Site Assessment. If hazardous materials conditions related to agricultural chemical residues in site soils are found that pose a threat to public health and safety, the project developer shall implement all remediation actions identified in the Phase II Environmental Site Assessment. Performance standards in the form of Environmental Screening Levels utilized by the San Francisco Bay Area Regional Water Quality Control Board and identified in the <i>User's Guide: Derivation and Application of Environmental Screening Levels</i> will be used to determine whether hazardous material conditions that pose a threat to public health and safety are present and as an initial guide for clean-up levels that must be attained to remediate such conditions. Hazardous materials removed from the site shall be managed consistent with regulations contained in the California Code of Regulations, Title 22 Division 4.5. Certification that remediation actions have been completed shall be provided to the City of Salinas Community Development Director.</p> <p>HAZ-2 Prior to the issuance of grading permits for development within parcel 2, the project developer shall prepare a Phase II Environmental Site Assessment. If hazardous</p>	<p>Less than Significant</p>

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>materials conditions related to agricultural chemical residues in site soils are found that pose a threat to public health and safety, the project developer shall implement all remediation actions identified in the Phase II Environmental Site Assessment. Performance standards in the form of Environmental Screening Levels utilized by the San Francisco Bay Area Regional Water Quality Control Board and identified in the <i>User's Guide: Derivation and Application of Environmental Screening Levels</i> will be used to determine whether hazardous material conditions that pose a threat to public health and safety are present and as an initial guide for clean-up levels that must be attained to remediate such conditions. Hazardous materials removed from the site, if any, shall be managed consistent with regulations contained in the California Code of Regulations, Title 22 Division 4.5. Certification that remediation actions have been completed shall be provided to the City of Salinas Community Development Director.</p>	
<p>Hazards to Public Health or the Environment from Exposure to Aerially Deposited Lead in Soils Located along U.S. Highway 101 that may be Disturbed by Construction Activities</p>	<p>Significant</p>	<p>HAZ-3 Prior to the issuance of grading permits for development, developers of individual projects within the project site that are located adjacent to U.S. Highway 101 shall retain a certified industrial hygienist or similar licensed professional to provide evidence about the potential presence of aerially deposited lead in soils within the individual project boundaries. If evidence suggests the presence of aerially deposited lead, developers shall retain a qualified expert to conduct soil testing for aerially deposited lead in locations where project grading and excavations may have potential to result in release of this material. The testing scope should include preparation of a site-specific work plan specifying surface sample or soil boring locations, sample collection, laboratory analysis, and preparation of findings, and recommendations. The testing report must identify lead concentrations in such locations and whether the lead concentration exceeds the Environmental Screening Level for lead identified in the San Francisco Bay Area Regional Water Quality Control Board's <i>User's Guide: Derivation and Application of Environmental Screening Levels</i>. The Environmental Screening Level will be used as a guide for clean-up levels that must be attained to remediate contamination if such exists and exceeds the Environmental Screening Level. Hazardous materials removed from the site shall be managed consistent with regulations contained in California Code of Regulations, Title 22 Division 4.5. The testing program and remediation plans (as needed) will be completed prior to initiation of ground disturbance activities in locations where the expert has deemed that testing for aerially deposited lead is warranted. If remediation is needed in specific locations, the remediation process will also be completed prior to initiation of project related ground disturbance activities in those locations.</p> <p>HAZ-4 If the aerially deposited lead testing program identified in mitigation measure</p>	<p>Less than Significant</p>

4.0 Changes to the Summary

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		HAZ-3 identifies the presence of hazardous concentrations of lead in soils to be excavated or graded, project developers shall prepare and implement a worker health and safety plan training program. To avoid health effects on construction personnel, all personnel who may come in contact with contaminated soil will be trained in accordance with applicable Occupational Safety and Health Administration standards contained in 8 California Code of Regulations 5192 (e), Training. A site-specific worker health and safety plan defining potential contaminants and, where appropriate, proper personnel protective equipment will be employed. Worker training will be completed prior to initiation of ground disturbance in the hazard areas.	
Noise			
Expose Proposed Project Hotel Room Interiors to Noise Levels in Excess of State Standards	Significant	N-1 A suitable form of forced-air mechanical ventilation or equivalent internal noise attenuation measure(s) to be identified in coordination with the City of Salinas Building Department shall be installed at the hotel to ensure that interior noise levels in all rooms are less than 45 dBA. The applicant for the hotel project shall provide evidence to the City of Salinas Building Department that interior noise levels will meet this standard prior to the issuance of a building permit.	Less than Significant
Expose Travel Center Buildings to Interior Noise Levels in Excess of State Standards	Significant	N-2 A suitable form of forced-air mechanical ventilation or equivalent internal noise attenuation measure(s) to be identified in coordination with the City of Salinas Building Department shall be installed to service travel center buildings that are designed to remain fully closed (e.g. convenience store, fast food restaurant, etc.) to ensure that interior noise levels are less than 45 dBA. The applicant for the travel center project shall provide evidence to the City of Salinas Building Department that interior noise levels will meet this standard prior to the issuance of a building permit.	Less than Significant
Expose Interiors within Future Buildings within Parcel 4 to Noise Levels in Excess of State Standards	Significant	N-3 A suitable form of forced-air mechanical ventilation or equivalent internal noise attenuation measure(s) to be identified in coordination with the City of Salinas Building Department shall be installed in future buildings within parcel 4 to ensure that interior noise levels are less than 45 dBA. The applicant(s) for future development within parcel 4 shall provide evidence to the City of Salinas Building Department that interior noise levels will meet this standard prior to the issuance of a building permit.	Less than Significant

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
<p>Noise Generation from Future Operations within Parcels 3 and 4 that Affects the Adjacent Proposed Travel Center Uses and Existing Industrial Uses to the East</p>	<p>Significant</p>	<p>N-4 Potential impacts on adjacent commercial uses within parcel 2 and on existing industrial uses located to the east of parcels 3 and 4 from mechanical equipment employed in future development within parcels 3 and 4 shall be assessed in acoustical studies for each project proposed within parcels 3 and 4. The studies shall identify whether mechanical equipment noise will exceed City standards at the respective property lines of the commercial and industrial uses as identified in municipal code Table 37-50.50, Maximum Noise Standards. If standards are exceeded, methods to reduce noise exposure to levels below the applicable standard shall be identified and included as conditions of approval for the future use(s). Measures could include, but are not limited to: placing noise generating equipment as far from the affected uses as possible, and/or employing noise controls such as fan silencers, equipment enclosures, and screen walls. Prior to approval of individual projects within parcels 3 and 4, the City of Salinas Building Department will be responsible for reviewing the noise study(s) and ensuring that noise attenuation measures are included incorporated into individual projects required.</p>	<p>Less than Significant</p>
<p>Construction Noise from Development of the Proposed Hotel with Potential to Adversely Affect the Adjacent Off-Site Motel 6 Use</p>	<p>Significant</p>	<p>N-5 The applicant for the proposed hotel project on parcel 1 shall prepare a construction noise attenuation plan which shall be implemented during hotel construction activities. The plan shall be subject to review and approval by the Community Development Director, prior to the issuance of a grading permit. The construction noise attenuation plan shall include the following best management practices to reduce construction noise at the common property line with the adjacent Motel 6 to the north of parcel 1:</p> <ul style="list-style-type: none"> • Restrict noise-generating activities at construction sites or in areas adjacent to construction sites to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday. Construction shall be prohibited on Saturdays, Sundays and holidays unless prior written approval is granted by the building official. • Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps. • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Prohibit unnecessary idling of internal combustion engines. 	<p>Less than Significant</p>

4.0 Changes to the Summary

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<ul style="list-style-type: none"> • Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from the Motel 6 as feasible. If they must be located near the motel, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels. Any enclosure openings or venting shall face away from the motel. • Utilize "quiet" air compressors and other stationary noise sources where technology exists. • Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and the Motel 6 during all project construction. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from the Motel 6. • Route all construction traffic via designated truck routes where possible. Prohibit construction related heavy truck traffic in residential areas where feasible. • Control noise from construction workers' radios to a point where they are not audible at the adjacent Motel 6. • The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with the adjacent Motel 6 use so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to the Motel 6 regarding the construction schedule. 	
Transportation			
Degraded Performance of Seven City-Controlled Intersections Due to Traffic Generated by the Proposed Project	Significant	<p>TRANS-1 Prior to issuance of building permits, all developers of individual projects within the specific plan area shall pay a fair share of the cost of a traffic signal at Roy Diaz Street/De La Torre (South), which would restore the intersection from unacceptable LOS F to an acceptable LOS A during the PM peak hour.</p> <p>TRANS-2 Prior to issuance of the first building permit, either the hotel developer or the travel center developer (whichever is first to request a building permit) shall construct a</p>	Less than Significant

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>traffic signal at Roy Diaz Street/De La Torre (South). Traffic generated by only 20 percent of total development capacity proposed for these projects combined triggers the need for this improvement. The subject developer shall enter into a reimbursement agreement with the City of Salinas for reimbursement of costs when fair-share costs are paid by developers of all other projects within the specific plan area as required pursuant to mitigation measure TRANS-1. Traffic signal design and construction shall be subject to review and approval by the City of Salinas Public Works Department. The City of Salinas Public Works Department shall ensure that the improvements have been completed prior to issuance of an occupancy permit for the subject project.</p> <p>TRANS-3 Prior to issuance of building permits, all developers of individual projects within the specific plan area shall pay a fair share of the cost of a traffic signal <u>(or other traffic control that is equally or more effective, as may be deemed appropriate based on the results of an Intersection Control Evaluation) at the Roy Diaz Street/U.S. Highway 101 northbound ramps. The Intersection Control Evaluation shall be prepared by either the hotel developer or the travel center developer (whichever is first to request a building permit). The Intersection Control Evaluation will be subject to review by Caltrans and City staff for selection of the final traffic control solution. The traffic signal improvement would restore the intersection from unacceptable LOS F to an acceptable LOS C during the PM peak hour. Any other traffic control to be considered based on the Intersection Control Analysis must restore operating conditions at the intersection to the minimum LOS D or better.</u></p> <p>TRANS-4 Prior to issuance of a building permit, the developer of the future individual project within Phase 2 of the project (within parcels 3 or 4) whose traffic generation represents more than 82 percent of the projected PM peak traffic volume for development within those parcels Phase 2 as shown in TIA Table 15, Fair Share Analysis, shall construct a traffic signal <u>(or other equally or more effective traffic control as may be warranted based on the Intersection Control Evaluation identified in mitigation measure TRANS-3) at Roy Diaz Street/U.S. Highway 101 northbound ramps.</u> The developer shall enter into a reimbursement agreement with the City of Salinas for reimbursement of costs when fair-share costs are paid by developers of all other projects within the specific plan area as required pursuant to mitigation measure TRANS-3. Traffic signal design <u>(or design of any other equally or more effective traffic control improvement identified through the Intersection Control Evaluation)</u> and construction shall be subject to review and approval by the City of Salinas Public Works Department. The City of Salinas Public Works Department shall ensure that the improvements have been completed prior to issuance of an occupancy permit for the</p>	

4.0 Changes to the Summary

Significant Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
		<p>subject project.</p> <p>TRANS-5 Prior to issuance of building permits, all developers of individual projects within the specific plan area shall pay a fair share of the cost of a traffic signal at Skyway Boulevard/Airport Boulevard. This improvement would restore the intersection from unacceptable LOS F to an acceptable LOS C during the PM peak hour.</p> <p>TRANS-6 Prior to issuance of the first building permit, either the hotel developer or the travel center developer (whichever is first to request a building permit) shall restripe the eastbound right-turn lane on Airport Boulevard to a shared left- and right-turn lane and reconfigure the intersection so that the eastbound Airport Boulevard approach is uncontrolled and stop control is added for the northbound left-turn and through movements and the southbound through movement on Skyway Boulevard. The westbound receiving leg of Airport Boulevard would have a single lane to receive the northbound left-turn movement and then pick up a second lane from the uncontrolled southbound right-turn movement from Skyway Boulevard. Traffic generated by either project triggers the need for this improvement. The subject developer shall enter into a reimbursement agreement with the City of Salinas for reimbursement of costs when fair-share costs are paid by developers of all other projects within the specific plan area as required pursuant to mitigation measure TRANS-5. Improvement designs and construction shall be subject to review and approval by the City of Salinas Public Works Department. The City of Salinas Public Works Department shall ensure that the improvements have been completed prior to issuance of an occupancy permit for the subject project.</p>	
Insufficient Provision of Transit Facilities	Significant	<p>TRANS-7 Each applicant for individual future projects proposed within parcels 3 and 4 shall consult with Monterey-Salinas Transit to determine whether the individual project triggers the need to provide transit. Such facilities could include bus stops, shelters, pull-outs, or other improvements deemed warranted by Monterey-Salinas Transit. Each applicant shall provide written evidence from Monterey-Salinas Transit as part of the project level entitlement application which verifies whether the project triggers the need for transit facilities. The information may be verified at the discretion of the Community Development Director. If facilities are needed, the applicant shall provide facility improvement plans designed to Monterey-Salinas Transit specifications to the City as part of the project application. The improvement plans shall be subject to review and approval of the Public Works Department and shall be installed prior to issuance of an occupancy permit.</p>	Less than Significant

SOURCE: EMC Planning Group 2017